

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RECEIVED
CIVIL ACTION NO. 04-CV-12169-REK
2004 NOV 5 3:46

U.S. DISTRICT COURT
DISTRICT OF MASS.

ANN MITCHELL, *
Plaintiff *
*
v. *
*
HALLMARK HEALTH SYSTEMS/ *
LAWRENCE MEMORIAL HOSPITAL *
JULIE CHASE SHAUGHNESSY *
Defendants *

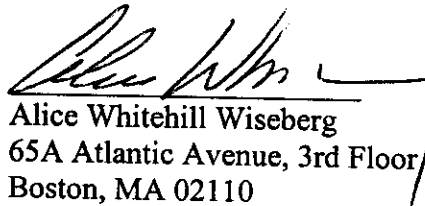
**PLAINTIFF'S ASSENTED TO MOTION TO EXTEND THE TIME TO FILE HER
OPPOSITION TO DEFENDANTS' MOTION TO DISMISS**

Plaintiff, Ann Mitchell, hereby moves that this Honorable Court extend the time by which Plaintiff must file her opposition to Defendants' Motion to Dismiss Compliant Counts II Through XI. As reasons therefore, Plaintiff states that Plaintiff is in the process of amending her complaint to add federal claims as a result of Defendants' removal of this matter to federal court. Plaintiff anticipates that Defendant will seek to amend/revise its/their Motion to Dismiss to reflect that additional causes of action in the Amended Complaint. Thus, the principals of efficiency and judicial economy dictate that Plaintiff not be required to oppose Defendants Motion to Dismiss until after Plaintiff's Amended Complaint and Defendants' amended/revised Motion to Dismiss are filed.

Wherefore, Plaintiff respectfully requests that this motion be allowed.

Respectfully submitted,
ANN MITCHELL
By Her Attorney,

November 3, 2004

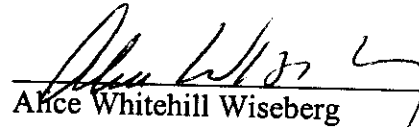

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Assented To:


Macon P. Magee

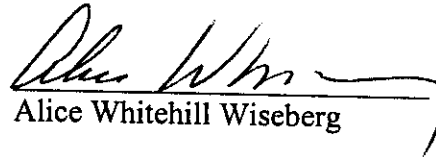
Certification Pursuant to Local Rule 7.1(A)(2)

I hereby certify, pursuant to Local Rule 7.1(A)(2) that on November 2, 2004 I contacted Defendants counsel, Macon Magee, by telephone and discussed in a reasonable and good faith effort to resolve and or narrow the issues addressed in this motion.


Alice Whitehill Wiseberg

Certificate of Service

I, Alice Whitehill Wiseberg, Esq., hereby certify that on this date a true copy of the above document was served upon the attorney of record for each other party by facsimile and first-class mail, postage prepaid.


Alice Whitehill Wiseberg